

AO 91 (Rev. 08/09) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Southern District of Florida

United States of America

v.

JAHMARA RAWLINS,

*Defendant.*

Case No. 22-6117-VALLE

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the dates of January 30, 2022 in the county of Broward in the  
Southern District of Florida, the defendant violated:

*Code Section*  
18 U.S.C. § 922(a)(6)

*Offense Description*  
Purchase of a Firearm by Means of a False Statement

This criminal complaint is based on these facts:

See attached affidavit.

☒ Continued on the attached sheet.

*Complainant's signature*

Georgie Garcia, Deportation Officer, ICE

*Printed name and title*

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by FaceTime  
on March 15, 2022.

*Judge's signature*

City and state: Fort Lauderdale, Florida

Alicia O. Valle, United States Magistrate Judge

*Printed name and title*

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

Your Affiant, Georgie Garcia, being duly sworn, depose and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. I am “an investigative or law enforcement officer” of the United States within the meaning of Title 18, United States Code, Section 2510(7), that is, an officer of the United States who is empowered by law to conduct investigations of, and to make arrests for, the offenses enumerated in Section 2516 of Title 18, United States Code.

2. I am a federal law enforcement officer employed by the United States Department of Homeland Security, Immigration and Customs Enforcement, Enforcement and Removal Operations (“ICE-ERO”), and its predecessor the U.S. Department of Justice, Immigration and Naturalization Service and have been so employed since approximately March 3, 1997. My current responsibilities include the investigation of criminal, civil, and administrative violations related to the Immigration and Nationality Act, and other federal criminal offenses to include firearms trafficking offenses. I have approximately twenty-five (25) years of law enforcement experience, during which I have participated in hundreds of criminal and administrative immigration related investigations. I am currently assigned to the Miami Field Office, ICE-ERO Fugitive Operations Unit.

3. Based on the facts set forth in this Affidavit, there is probable cause to believe that **Jahmara Rawlins (“RAWLINS”)**, did knowingly and unlawfully make a false statement in the acquisition of a firearm, in violation of 18 U.S.C. § 922(a)(6).

4. The statements contained in this Affidavit are based on my personal knowledge, as well as information provided by other individuals, including other law enforcement officials, and my review of records and other evidence obtained during the course of this investigation. I have

not included each and every fact known to me and to other law enforcement officers involved in this investigation, but only the facts sufficient to establish probable cause.

**PROBABLE CAUSE**

***Background Investigation***

5. On or about February 4, 2022, the Royal Bahamas Police Force ("RBPF") intercepted a Dash Express<sup>1</sup> package in Nassau, Bahamas that was in the name of "C.J.". The package contained eight firearms that were wrapped in plastic, zip-tied and concealed in merchandise located inside the package. Some of the firearms had obliterated serial numbers.

6. The firearms were seized and a firearms trace was conducted on each of the firearms for the purpose of ascertaining when the firearms were purchased, and by whom. On or about February 11, 2022, the firearm trace information was received. The firearms with obliterated serial numbers were restored and four (4) of the eight (8) firearms were traced to purchases made by Jahmara Rawlins ("RAWLINS") in the United States from AB Pawn and Gun, a Federal Firearms License dealer ("FFL") in Broward County, Florida.

7. An investigation revealed that RAWLINS began purchasing firearms in the Southern District of Florida in December 2021. The query also revealed that RAWLINS was scheduled to pick up additional firearms at AB Pawn and Gun on February 16, 2022.

8. On February 16, 2022, agents conducted a consensual encounter with RAWLINS for the purpose of issuing RAWLINS an ATF cease-and-desist letter. During the conversation with RAWLINS, he admitted to purchasing firearms, grinding off the serial numbers, and selling the firearms to other individuals. One of those individuals RAWLINS named as "Frenchy." RAWLINS stated he sold "Frenchy" three (3) or four (4) Taurus G2C pistols, and two (2) rifles.

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<sup>1</sup> Dash Express is a courier delivery service that ships packages to and from the United States.

RAWLINS stated he sold "Frenchy" the pistols for \$500.00 each. RAWLINS' purchase receipt from AB Pawn and Gun, on January 30, 2022, showed the Taurus G2C pistols cost him \$250 each. RAWLINS stated one (1) or two (2) of the firearms he sold to "Frenchy" had obliterated serial numbers, which RAWLINS had grinded off.

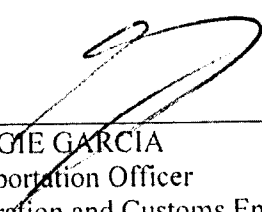
9. Agents also recovered the ATF Form 4473 that RAWLINS completed in connection with the firearms he purchased on January 30, 2022. The ATF Form 4473 reflects that RAWLINS selected "Yes" to question Section 21.a which asks "Are you the actual transferee/buyer of the firearm(s) listed on this form and any continuation sheet(s) (ATF Form 5300.9A) Warning: you are not the actual transferee/buyer if you are acquiring the firearm(s) on behalf of another person. If you are not the actual transferee/buyer, the licensee cannot transfer the firearm(s) to you." RAWLINS then signed and certified his answers which has the following warning above his signature, "I have read and understand the Notices, Instructions, and Definitions on ATF Form 4473. I understand that answering "yes" to question 21.a if I am not the actual transferee/buyer is a crime punishable as a felony under Federal law, and may also violate State and/or local law."

[SPACE INTENTIONALLY LEFT BLANK]

CONCLUSION

Based on the foregoing facts, I respectfully submit that that there is probable cause to support a criminal complaint charging **Jahmara Rawlins ("RAWLINS")** with violations of 18 U.S.C. § 922(a)(6) (false statement during a firearms purchase).

FURTHER YOUR AFFIANT SAYETH NAUGHT.



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GEORGIE GARCIA  
Ice Deportation Officer  
Immigration and Customs Enforcement

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by Telephone, on this 15th day of March, 2022, at Fort Lauderdale, Florida



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ALICIA O. VALLE  
UNITED STATES MAGISTRATE JUDGE